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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

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*In Re Google Generative AI Copyright Litigation*

Case No. 5:23-cv-03440-EKL  
Consolidated Case No. 5:24-cv-02531-EKL  
**STIPULATION & [PROPOSED] ORDER  
EXTENDING TIME TO RESPOND TO  
MOTION TO STRIKE AND REQUEST  
FOR JUDICIAL NOTICE**  
Judge: Hon. Eumi K. Lee

CASE NUMBERS: 5:23-cv-03440-EKL AND 5:24-cv-02531-EKL

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STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO  
MOTION TO STRIKE AND REQUEST FOR JUDICIAL NOTICE

1       The parties to the above-referenced action, through their respective counsel of record, hereby  
2 stipulate to the following regarding the time to respond to Defendants' Motion to Strike and Request  
3 for Judicial Notice:

4       WHEREAS, Defendants filed a Motion to Dismiss the Consolidated Amended Complaint on  
5 January 17, 2025, Dkt. No. 95 ("Motion to Dismiss");

6       WHEREAS, Defendants simultaneously filed a Request for Judicial Notice and Consideration  
7 of Materials Incorporated by Reference in Support of the Motion to Dismiss the Consolidated  
8 Complaint, Dkt. No. 96 ("Request for Judicial Notice"), and a Motion to Strike Class Allegations,  
9 Dkt. No. 98 ("Motion to Strike");

10       WHEREAS, pursuant to the Court's Order at Dkt. No. 88, Plaintiffs' deadline to respond to  
11 the Motion to Dismiss is February 7, 2025, and Defendants' deadline to file a reply in support of the  
12 Motion to Dismiss is February 21, 2025;

13       WHEREAS, in the absence of a clarifying court order and pursuant to the local rules,  
14 Plaintiffs' deadline to respond to the Request for Judicial Notice and the Motion to Strike may be  
15 January 31, 2025, and Defendants' deadline for reply briefs may be February 7, 2025;

16       WHEREAS, Defendants' Motion to Dismiss and Motion to Strike are both noticed for hearing  
17 on April 23, 2025 at 10:00 a.m.; and

18       WHEREAS, the Parties agree that, for efficiency and consistency, responses and replies to all  
19 of these motions should be submitted simultaneously;

20       It is hereby stipulated as follows:

21       1.       Plaintiffs' Responses to the Motion to Strike and the Request for Judicial Notice shall  
22 be due on February 7, 2025, the same date that Plaintiffs' Response to the Motion to Dismiss is due;

23       2.       Defendants' Replies in Support of the Motion to Strike and the Request for Judicial  
24 Notice shall be due on February 21, 2025, the same date that Defendants' Reply in Support of the  
25 Motion to Dismiss is due; and

26       3.       The hearing on Defendants' Motion to Dismiss and Motion to Strike is unaffected by  
27 this order and remains set for April 23, 2025.

1 **IT IS SO STIPULATED.**  
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1 Dated: January 24, 2025

2 Respectfully Submitted,

3 By: /s/ Joseph R. Saveri

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28 *Plaintiffs and the Proposed Class*

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Dated: January 24, 2025

Respectfully Submitted,

/s/ Paul J. Sampson

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Attorneys for Defendants Google LLC and Alphabet Inc.

## [PROPOSED] ORDER

**PURSUANT TO THE STIPULATION, IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2025

Hon. Eumi K. Lee  
United States District Court Judge

1 **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

2 I, Laura M. Matson, attest that concurrence in the filing of this document has been obtained  
3 from the other signatories. I declare under penalty of perjury that the foregoing is true and correct.

4 Executed this 24th day of January, 2025, at Minneapolis, Minnesota.

5 */s/ Laura M. Matson*

6 Laura M. Matson

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**CERTIFICATE OF SERVICE**

2 I, Laura M. Matson, hereby certify that on January 24, 2025, I electronically filed the  
3 foregoing document with the Clerk of the United States District Court for the Northern District of  
4 California using the CM/ECF system, which will send electronic notification to all counsel of record.

/s/ Laura M. Matson  
Laura M. Matson